

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:)	
)	
THE FINANCIAL OVERSIGHT AND)	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,)	Title III
)	
as representative of)	Case No. 3:17-bk-03283 (LTS)
)	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,)	
)	
Debtors.)	
)	
In re:	X	
)	
THE FINANCIAL OVERSIGHT AND)	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO)	Title III
)	
as representative of)	Case No. 3:17-cv-01685 (LTS)
)	Case No. 3:17-bk-03566 (LTS)
)	
THE EMPLOYEES RETIREMENT SYSTEM OF THE)	
GOVERNMENT OF THE COMMONWEALTH OF)	
PUERTO RICO,)	
)	
Debtor.)	
)	
	X	

**URGENT JOINT MOTION FOR LEAVE TO EXCEED THE PAGE LIMITS FOR
THE PARTIES' MOTIONS TO COMPEL DISCOVERY IN CONNECTION WITH
THE MOTION OF CERTAIN SECURED CREDITORS
OF THE EMPLOYEES RETIREMENT SYSTEM
OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO
FOR RELIEF FROM THE AUTOMATIC STAY**

To the Chambers of the Honorable Judith G. Dein:

Certain secured bondholders of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (the “Bondholders”),¹ the Commonwealth, ERS, the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), and the Financial Oversight and Management Board (the “Oversight Board”), as ERS’s and the Commonwealth’s representative pursuant to Section 315(b) of PROMESA (together, the “Parties”), respectfully submit this joint motion seeking entry of an order, substantially in the form of **Exhibit A**, regarding the page limits for discovery briefing in connection with the Bondholders’ Motion for Relief from the Automatic Stay (Docket No. 289 in Case No. 17-bk-03566) (the “Stay Relief Motion”). In support of the Motion, the Parties state as follows:

1. On March 15, 2019, Judge Swain entered an expedited schedule for discovery and briefing in connection with the Bondholders’ Stay Relief Motion. *See* Docket No. 5712 in Case No. 17-bk-03283 and Docket No. 393 in Case No. 17-bk-03566. The order set a March 18, 2019, deadline for the Parties to meet and confer on outstanding discovery issues, and a deadline of

¹ The Bondholders include Andalusian Global Designated Activity Company, Glendon Opportunities Fund, L.P., Mason Capital Master Fund L.P., Oaktree-Forrest Multi- Strategy, LLC (Series B), Oaktree Opportunities Fund IX, L.P., Oaktree Opportunities Fund IX (Parallel 2), L.P., Oaktree Value Opportunities Fund, L.P., Ocher Rose, L.L.C., Puerto Rico AAA Portfolio Bond Fund, Inc., Puerto Rico AAA Portfolio Bond Fund II, Inc., Puerto Rico AAA Portfolio Target Maturity Fund, Inc., Puerto Rico Fixed Income Fund, Inc., Puerto Rico Fixed Income Fund II, Inc., Puerto Rico Fixed Income Fund III, Inc., Puerto Rico Fixed Income Fund IV, Inc., Puerto Rico Fixed Income Fund V, Inc., Puerto Rico GNMA & U.S. Government Target Maturity Fund, Inc., Puerto Rico Investors Bond Fund I, Puerto Rico Investors Tax-Free Fund, Inc., Puerto Rico Investors Tax-Free Fund, Inc. II, Puerto Rico Investors Tax-Free Fund III, Inc., Puerto Rico Investors Tax-Free Fund IV, Inc., Puerto Rico Investors Tax-Free Fund V, Inc., Puerto Rico Investors Tax- Free Fund VI, Inc., Puerto Rico Mortgage-Backed & U.S. Government Securities Fund, Inc., SV Credit, L.P., Tax-Free Puerto Rico Fund, Inc., Tax-Free Puerto Rico Fund II, Inc., and Tax-Free Puerto Rico Target Maturity Fund, Inc.

March 21, 2019, at 3:00 PM AST, for the Parties' first round of motions to compel. The hearing on those motions is set for April 1, 2019.

2. On March 18, 2019, the Parties held a 90-minute meet-and-confer telephone call. During that call, the Parties were unable to resolve their differences. The Parties therefore anticipate filing motions to compel on a number of different issues.

3. In light of the expedited schedule and the complexity of issues, the Parties seek to streamline the motions to compel due on March 21, 2019, at 3:00 PM AST as follows: The Bondholders agree to file a single omnibus motion to compel, and ERS, the Commonwealth, AAFAF, and the Oversight Board agree to file a single omnibus motion to compel. The Parties agree to the following page limits:

- a. motions to compel will not exceed 35 pages (excluding exhibits, pages containing the case caption, and signature pages);
- b. oppositions to any such motions to compel will not exceed 35 pages (excluding exhibits, pages containing the case caption, and signature pages); and
- c. replies in support of any such motions to compel will not exceed 20 pages (excluding exhibits, pages containing the case caption, and signature pages).

4. The Parties' counsel hereby certify that they have made reasonable, good-faith communications in an effort to resolve or narrow the issues that are being brought to the Court. Because the Parties are moving jointly for relief, no oppositions will be filed.

5. No previous request for the relief sought herein has been made by the Parties to this or any other court.

WHEREFORE, the Parties respectfully request that this Court enter an order substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as this Court deems appropriate.

In San Juan, Puerto Rico, today March 20, 2019.

By:

/s/ Alfredo Fernández-Martínez

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CERTIFICATE OF SERVICE

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

Dated: March 20, 2019

/s/ Bruce Bennett
Bruce Bennett

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:)	
)	
)	PROMESA
THE FINANCIAL OVERSIGHT AND)	Title III
MANAGEMENT BOARD FOR PUERTO RICO,)	
)	Case No. 3:17-bk-03283 (LTS)
as representative of)	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>)	
)	
Debtor.)	
	X	
In re:)	
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)	PROMESA
THE FINANCIAL OVERSIGHT AND)	Title III
MANAGEMENT BOARD FOR PUERTO RICO)	
)	Case No. 3:17-cv-01685 (LTS)
as representative of)	Case No. 3:17-bk-03566 (LTS)
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THE EMPLOYEES RETIREMENT SYSTEM OF THE)	
GOVERNMENT OF THE COMMONWEALTH OF)	
PUERTO RICO,)	
)	
Debtor.)	
	X	

**ORDER GRANTING JOINT MOTION FOR LEAVE TO EXCEED THE PAGE
LIMITS FOR THE PARTIES' MOTIONS TO COMPEL DISCOVERY IN
CONNECTION WITH THE MOTION OF CERTAIN SECURED CREDITORS
OF THE EMPLOYEES RETIREMENT SYSTEM
OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO
FOR RELIEF FROM THE AUTOMATIC STAY**

Upon consideration of the *Urgent Joint Motion for Leave to Exceed the Page Limits for the Parties' Motions to Compel Discovery in Connection With the Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto*

Rico for Relief From the Automatic Stay (the “Urgent Motion”) seeking leave to exceed the page limits for discovery motions to compel in connection with the Motion for Relief from the Automatic Stay (Docket No. 289 in Case No. 17-bk-03566); and the Court having found that it has subject matter jurisdiction over this matter pursuant to PROMESA section 306; and it appearing that venue in this district is proper pursuant to PROMESA section 307; and the Court having found that the relief requested in the Urgent Motion is in the best interests of the title III debtors, their creditors, and other parties in interest; and due and proper notice of the Urgent Motion has been provided under the particular circumstances and that no other or further notice is required; and after due deliberation and sufficient cause appearing therefore, it is hereby ORDERED that:

1. The Urgent Motion is GRANTED. With respect to the briefing on the motions to compel due March 21, 2018 at 3:00 PM AST, (i) the Bondholders shall file a single omnibus motion to compel, and (ii) ERS, the Commonwealth, AAFAF, and the Oversight Board shall file a single omnibus motion to compel. The following page limits shall apply to this briefing:

- a) motions to compel shall not exceed 35 pages (excluding exhibits, pages containing the case caption, and signature pages);
- b) oppositions to any such motions shall not exceed 35 pages (excluding exhibits, pages containing the case caption, and signature pages); and
- c) replies in support of any such motions to compel shall not exceed 20 pages (excluding exhibits, pages containing the case caption, and signature pages).

2. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

Date: March __, 2019

THE HONORABLE JUDITH GAIL DEIN
UNITED STATES MAGISTRATE JUDGE